

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

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NOTICE OF LODGING DOCUMENTS UNDER SEAL
TO THE COURT AND ITS ATTORNEYS OF RECORD:

Plaintiffs hereby give notice that they are provisionally lodging under seal Plaintiffs' Exhibit 2 to the Declaration of Vanessa Baehr-Jones in support of the Opposition.

Provisional sealed filing is appropriate with respect to Exhibit 2, the unredacted copy of excerpts of the deposition transcript of District Attorney General Steven Finney, because portions of the transcript have been designated "Confidential" by the District Attorney's Office for the First Judicial District of Tennessee. Plaintiffs have met and conferred with the District Attorney's Office concerning the redactions to the deposition transcript of DA Finney but have been unable to reach an agreement to de-designate this transcript in full.

Plaintiffs therefore request the Court provisionally seal Exhibit 2.

Dated: November 14, 2024

Respectfully submitted,

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715

Pro Hac Vice

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on November 14, 2024 to counsel of record:

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/s/ Julie C. Erickson
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